

EXHIBIT A

Re: Motion to Proceed under Pseudonym and Motion for Protective Order

Joseph McBride <jmcbride@mcbridelawnyc.com>

Tue 8/29/2023 4:41 PM

To: Dani Pinter <dpinter@ncoselaw.org>

Cc: Thomas Maniotis <tamaniotis@equitylegal.net>; Peter Gentala <pgentala@ncoselaw.org>; tamaniotisesq@gmail.com <tamaniotisesq@gmail.com>; cwaugh@waugh.legal <cwaugh@waugh.legal>; Cassandra D <cassandra@mcbridelawnyc.com>; Paul Ingrassia <paul@mcbridelawnyc.com>

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Ms. Pinter,

Andrew and Tristan Tate are the Plaintiffs and Victims in this case.

We will, therefore, object to any attempt to mischaracterize [REDACTED] as a victim.

[REDACTED] is a Sexual Predator, Blackmailer, and Extortionist who will likely be criminally prosecuted for her actions.

She is NOT a victim.

Regarding your request to use a pseudonym, the answer is a hard NO.

This is because there is an overriding public interest in ensuring justice is achieved and men everywhere protected, from being harmed by [REDACTED].

The plaintiff's legal team will get back as soon as our schedules allow, regarding your request for the protective order.

Sincerely,

On Tue, Aug 29, 2023 at 1:48 PM Dani Pinter <dpinter@ncoselaw.org> wrote:

Good Afternoon Mr. Maniotis,

I am writing because the defendants plan to file a motion to proceed under pseudonym and a motion for protective order. Accordingly, would Plaintiffs' be willing to consent to changing the case caption and allowing the defendants' to proceed under pseudonym in light of the ongoing criminal case and the sensitive nature of the allegations? Relatedly, would you agree to a stipulated protective order that would protect the private personal information of both parties from public disclosure? Please let me know your position by COB tomorrow.

Thank you,

Dani Bianculli Pinter

Senior Legal Counsel I National Center on Sexual Exploitation

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